Greater Tucson
Coalition for Solar Energy

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Coalition Partners

- The City of Tucson
- Town of Marana
- Tucson Unified School District
- Pima Community College
- University of Arizona
- Community of Civano
- Armory Park Del Sol
- John Wesley Miller Companies
- Progressive Solar
- The Solar Store
- Expert Solar Systems
- American Solar Electric
- SolarBuilt
- Primavera Builders
- Dreambuilders
- BTB Solutions
- Larry Medlin Architects
- Venture Catalyst Inc.

Comments of the Greater Tucson Coalition for Solar Energy Environmental Portfolio Standard Workshops

April 12, 2004

The Greater Tucson Coalition for Solar Energy ("GTCSE") is a public-private partnership dedicated to the deployment of solar energy technologies since 1997. GTCSE thanks the Commissioners for their leadership and appreciates the opportunity to make the following comments on:

1. Portfolio Percentage
2. Expiration Date
3. Technologies & Mix
4. Funding Issues

Summary of Comments

1. Implement an additional Renewable Portfolio Standard of 15-20%.
2. Eliminate the EPS expiration date.
3. Technology mix should strongly favor solar and distributed, customer sited installations.
4. Increase the surcharge to fund the commitment to renewable energy, restore Demand Side Management funding, and include competitive proposals for EPS funded programs by non-utility organizations.

1. Implement an additional Renewable Portfolio Standard of 15-20%. An EPS of 15-20% is attainable, although it would need to include the full range of renewable energy options, as well as solar energy. There are large amounts of renewable energy resources available in Arizona, and many of these renewable resources, such as wind energy and landfill gas, are cost effective (or nearly so) compared to conventional generation. ***An expanding market and awareness of all renewable energy options strengthens the market for solar energy.*** Market growth is dependent on many people making renewable energy choices, even if each choice is a modest one. Awareness and options are critical to this occurring.

Arizona is currently positioned to be a renewable energy leader. We could loose our edge. Other states in the region are committing to levels of renewable energy much higher than 1.1%, e.g.: New Mexico, 10% by 2011; Nevada, 15% by 2013; and California, 20% by 2017. An increase in the current Arizona standard would assure our competitiveness.

2. Eliminate the EPS expiration date. We need this (and other) renewable policy to be a ***permanent*** part of how we produce, distribute and consume energy in our state if we are to be safe and prosperous. From a functional perspective, the certainty that the elimination of expiration creates will attract more financial resources and on better terms.

3. Technology mix should strongly favor solar and distributed, customer-sited installations. As the EPS expands, it is important that the commitment to solar in the current standard be maintained as a minimum either in terms of a level of megawatts or percentage of funding. As well, distributed, customary sited systems should be supported by a minimum funding level. Customer sited distributed systems enhances the economic development value of the EPS. Nine distributed generation jobs can be created for every five for central station. Distributed generation enhances the ability to meet the demand of consumers for energy choices and strengthens regional vendor and installer businesses. It creates and strengthens energy generation options for the community. A diversified generation industry offers consumers a wide range of choices and prices. It increases control over power quality based on cost rather than the "take it or leave it" approach of traditional suppliers. It increases control over reliability, choosing the level of surety needed at the load. It increases visibility in the community, demonstrating that valued technologies are being applied. It increases functionality by offering multiple uses (i.e., solar systems can double as shading structures.

4. Increase the surcharge to fund the commitment to renewable energy, restore Demand Side Management funding, and include competitive proposals for EPS funded programs by non-utility organizations. Pursue cost-effective energy efficiency opportunities. Implement an energy savings goal, with adequate funding to achieve the goal. Energy efficiency strategies are key to effective use of solar energy in the market place. Energy efficiency is a fiscally conservative first step in positively transforming our regional energy market and it is catalytic for the development of solar energy markets.

Productive support for renewable energy installations and the state's renewable energy industry could best be delivered by means of a diversity of programs and approaches. This could be achieved by carving out EPS funds for a competitive solicitation among program designers and producers, as is done in many other states for renewable and energy efficiency funds collected by utilities.

Thank you for your leadership on clean energy policies and programs in Arizona, and for the opportunity to submit these comments.

Sincerely,

Valerie Rauluk, Director
Greater Tucson Coalition for Solar Energy